

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DANA N. ESCOFFIER,

Plaintiff,

-against-

CITY OF NEW YORK

Chief Campisi, Ass't Chief Thompson

Insp. Cokkinos, Officer Connolly

Officer Sanchez, Officer Hall,

Officer Velardi, Officer Basnight,

Officer Mendoza, Officer Marino

Officer Carra, Officer Severino,

Officer Robertson, Det. Lt. Hellman,

Officer Abbott, Officer Castillo,

Det. Sebastian, Sgt. Calle, Officer Belger,

Sgt. Aynbinder, Officer Nugent, Sgt. Termine

Officer Martinez, Officer Andrews,

Officer Brown, Officer Duffy, Det. Walsh,

Det. Bernardes, Sgt. Balunas, Off. Alberici,

Det. Wheeler, Officer Fusco, Det. Biondolilo,

Sgt. Det. Nilan, Officer Marte, Det. Davis,

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/30/13

**AMENDED
COMPLAINT**

Jury Trial: ☐ YES ☐ NO

13 Civ. 3918 (LAP)

Sgt./Lt. Anderson, Officer Anollino, Capt. Spano,
Det. Smithson, Det. Davis (IAB), Officer Baranski
and John and Jane Doe 1-20

TIME EQUITIES, INC.
HUDSON STREET EQUITIES GROUP

Frances Greenberger, Robert Kantor,
Bruce Rittenberg, Seth Coston, Sherri O'Keefe,
Shavon, Virgil Olaru, Brandy A. Smith, Thomas Fleishell
and John and Jane Doe 1-20

DANIELLA GALLEGGO

I PARTIES IN THIS COMPLAINT

Plaintiff: Dana N. Escoffier
523 Hudson Street #4FS
New York County, New York
New York 10014
(212) 675-3836

Defendant No.1 City of New York
1 Centre Street
New York County, New York
New York 10007
(212) 669-7318

Defendant No.2 Time Equities, Inc.
55 Fifth Avenue
New York County, New York
New York 10003
(212) 206-6000

Defendant No.3 Hudson Street Equities Group
55 Fifth Avenue
New York County, New York
New York 10003
(212) 206-6000

Defendant No.4 Daniella Gallego
523 Hudson Street #5FS
New York County, New York
New York 10014

Defendant No.5 Brandy A. Smith
561 Seventh Avenue, 19th Floor
New York County, New York
New York, 10018
(212) 972-1355

Defendant No.6 Thomas Fleishell *ASSOCIATES*
561 Seventh Avenue, 19th Floor
New York County, New York
New York 10018
(212) 972-1355

II BASIS FOR JURISDICTION

A. What is the Basis for Federal Court Jurisdiction?

X Federal Questions ___ Diversity of Citizenship

B. If the basis for jurisdiction Federal Question, what federal Constitutional statutory or treaty right is at issue?

Deprivation of Civil Liberties

Violation of First Amendment

Violation of Fifth Amendment

Violation of Fourteenth Amendment

C. If basis for jurisdiction of Diversity of Citizenship, what is the State of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III STATEMENT OF CLAIM

A. Where did the events giving rise to your claim(s) occur?

County of New York, City of New York, State of New York

B. What date and approximate time did events giving rise to your claim(s) occur?

August, 2010 - October, 2013

C. FACTS:

Deprivation of Civil Liberties

Violation of First Amendment

Violation of Fifth Amendment

Violation of Fourteenth Amendment

Illegal Search and Seizure

Illegal Surveillance

Negligence

Malfeasance

Profiling

Assault and Battery

Collusion

Tortuous Interference

Discrimination

Slander

Infliction of Mental Anguish and Emotional Distress

IV INJURIES

Loss Of Property, value not less than \$250,000.00

Mental Anguish and Emotional Distress

Loss of freedom of speech

Defamation

Deprivation of protection under the law

Conspiracy

Physical harm requiring surgical intervention,

medication for exhaustive stress, mental and physical

depression

V RELIEF

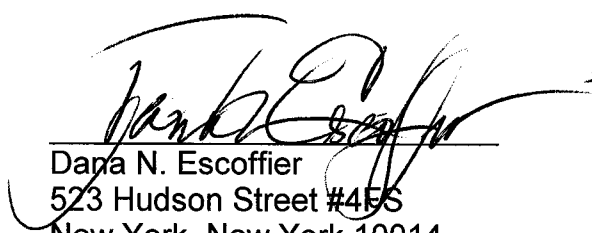
Plaintiff seeks damages in the amount of ten million dollars

Injunctive Relief

Plaintiff has lost possession of property, estate property, suffered great mental anguish and emotional distress, physical abuse and harm, discrimination based on disability and loss of privacy through surveillance.

I declare, under the penalty of perjury, that the foregoing is true and correct.

Signed this 30th day of October, 2013



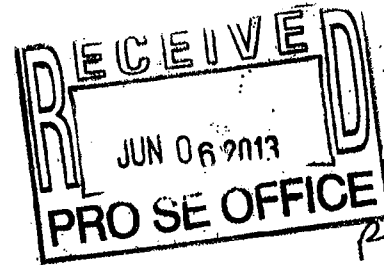
Dana N. Escoffier
523 Hudson Street #4ES
New York, New York 10014
(212) 675-3836

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKDANA N. ESCOFFIER

(In the space above enter the full name(s) of the plaintiff(s).)

COMPLAINT

-against-

NEW YORK Police Department
TIME EQUITIES, INC.
HUDSON STREET EQUITIES
JOHN DOE 1-20
JANE DOE 1-20Jury Trial: ☐ Yes ☒ No
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name DANA N. ESCOFFIER
 Street Address 523 HUDSON ST. #4FS
 County, City NEW YORK, NEW YORK
 State & Zip Code NEW YORK 10014
 Telephone Number 212 675 3836

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name CITY OF NEW YORK, CORP. Council of N.Y.
 Street Address _____

County, City _____
 State & Zip Code _____
 Telephone Number _____

Defendant No. 2

Name TIME EQUITIES, INC
 Street Address 55 FIFTH AVE
 County, City NEW YORK, NY. 10003
 State & Zip Code NEW YORK 10003
 Telephone Number _____

Defendant No. 3

Name HUDSON STREET EQUITIES
 Street Address 55 FIFTH AVE
 County, City NEW YORK, NY.
 State & Zip Code NEW YORK 10003
 Telephone Number _____

Defendant No. 4

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions☐ Diversity of CitizenshipB. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? CIVIL RIGHTS ACTION

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship XDefendant(s) state(s) of citizenship X**III. Statement of Claim:**

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? GREENWICH VILLAGE, NY, 523 HUDSON ST. NY NY 10014 APT #405

B. What date and approximate time did the events giving rise to your claim(s) occur? _____

VARIOUS TIMES

C. Facts: TO BE ~~COMPLETED LATER~~

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

DANIELLA GALLEGO, APT. #505, A NEIGHBOR NEIGHBOR HARASSING ME FROM APT. #505,

YEARS OF CONDUCT DESTROYING MY QUALITY OF LIFE. CALLED LANDLORD TO COMPLAIN, INSTEAD OF ~~LEAVE~~

APPROPRIATE ACTION AGAINST NEIGHBOR, LANDLORD CONSPIRED WITH POLICE TO ARREST ME ~~FOR~~

IV. Injuries: DEPRIVING ME OF MY RIGHTS AND DISCRIMINATION AGAINST DISABLED PER

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. AMERICANS w/ DISABILITIES

ANXIETY, MENTAL STRESS AND ANXIETY, MIGRAINES, WORSENING *TBI DUE TO STRESS, CHRONIC INSOMNIA * (SYMPTOMS)

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. _____

TEN MILLION DOLLARS.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 6 day of JUNE, 2013

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

Handwritten Signature
523 HUDSON ST. #485
NY NY 10014
212 675 3836

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20__, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff: _____

Inmate Number _____